1 MARILYN E. BEDNARSKI (No. 105322) KAYE, McLANE & BEDNARSKI, LLP FILED 128 North Fair Oaks Avenue 2 CLERK, U.S. DISTRICT COURT Pasadena, CA 91103 Telephone (626) 844-7660 3 Facsimile (626) 844-7670 JUN 12 2006 mbednarski kmb@earthlink.net Storneys for Defendant CENTRAL DISTRIC CALIFORNIA RONALD PHILLIP WALLACE DEPUTY **Priority** UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA WESTERN DIVISION JS-2/JS-3 Scan Only. 10 UNITED STATES OF AMERICA. NO. CR 04-1376-CBM 11 Plaintiff. STIPULATION IN SUPPORT OF 12 CONTINUING DEFENDANT WALLACE'S SENTENCING V. DATE TO JULY 31, 2006: RONALD PHILLIP WALLACE, PROPOSED ORDER Defendant.

IT IS HEREBY STIPULATED AND AGREED by and between plaintiff, United States of America, by and through its attorneys of record, Assistant United States Attorney, Matt E. Sloan, and defendant, Ronald PhillipWallace, by and through his attorney of record, Marilyn E. Bednarski, that the sentencing hearing in this case be continued from the currently scheduled date, June 12, 2006 at 1:30 p.m. to July 31, 2006 at 1:30 p.m. This request is based on the following:

- 1. Mr. Wallace plead guilty on June 29, 2005. Counsel Marilyn E. Bednarski was retained and substituted into the case mid-October 2005. Sentencing was set prior to the substitution for December 12, 2005 but was continued upon stipulation to February 27, 2006. It was again continued upon the defendant's exparte application to the June 12, 2006 date.
- 2. Defense counsel filed her extensive sentencing papers under seal on about May 16, 2006. The government thereafter sought, with the agreement of the DOCKETED ON CM.

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defendant, this Court's permission to disclose the under seal filing to the Bureau of Prisons with whom the government is consulting concerning the medical issues raised in the defendant's sentencing papers.

- 3. The government needs additional time to have the Bureau of Prisons review the sentencing position, doctor's letters, and medical records which have been disclosed by the defendant to the government. For this reason, the parties agree that the case is not ready to go forward to sentencing on June 12.
- 4. Mr. Wallace does not oppose this requested continuance. Through counsel Ms. Bednarski he reports that he is currently seriously ill with his Chron's disease suffering from internal bleeding so severe that he has been receiving blood transfusions over the past few weeks to raise his blood levels.
- 5. Mr. Wallace is on bond in this case in the amount of \$250,000 fully justified by the deeding of equity in the residence of his parents-in-law Reynolds and Sally Yater. He has been on pre-trial supervision under the direction of Los Angeles Pre-trial officer Kristianna Janich with actual supervision by Pre-trial Services Denise Dohanik in Grand Junction Colorado near the town of Basalt, Colorado where the defendant resides. He is in compliance with his supervision.

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1	6. For these reasons both parties stipulate to this Court continuing the
2	presently set date of June 12, 2005 to July 31, 2006.
3	Respectfully submitted,
4	M 5 10
5	DATED: June 8, 2006 By MARK Selling To Selling MARK SELLING By MARK SELLING MARK
6	Attorney at Law
7	
8	DEBRA W. YANG
9	United States Attorney
10	Mally C
11	DATED: June 9, 2006 By MMW Schu
12	Matt E. Sloan Assistant United States Attorney
13	Assistant Onited States Attorney
14	ORDER
15	GOOD CAUSE APPEARING from the above stipulation and files and records
16	in this case, it is hereby ordered that Mr. Wallace's sentencing hearing in this matter
17	is continued to July 31, 2006 at 1: 30 p.m.
18	DATED King 12 2006
19	DATED: June 12-2006 HON. CONSUELO B. MARSHALL
20	United States District Judge
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